

filing, the parties have not set a time to confer but have exchanged proposed dates and times for conference on the matter.

4. In order to permit the parties time to confer, Plaintiff moves unopposed to extend the deadline for submission of its response by fourteen days from November 29, 2022 to December 13, 2022 with Defendant to reply by December 27, 2022.

5. Defendant does not oppose the instant motion for extension of time.

6. No party will be prejudiced by grant of the instant motion for extension of time.

7. The instant motion is not brought for purposes of delay or harassment.

8. Grant of the instant request for extension of time is in the interest of judicial efficiency as Plaintiff hopes to avoid motion practice on the need for jurisdictional discovery with such negotiation perhaps leading to the resolution of Defendant's motion.

Prayer for Relief

Wherefore, Plaintiff respectfully requests that the Court grant the following relief:

a) That Plaintiff be permitted fourteen days from the current deadline of November 29, 2022 to December 13, 2022 to submit any discovery related motions;

b) That Defendant be required to reply to Plaintiff's Opposition by December 27, 2022, and

c) Any further and additional relief that the Court deems necessary and appropriate.

Respectfully submitted this 28th day of November, 2022,

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